



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 21, 2022

BY ECF

Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Lawrence Ray*, S2 20 Cr. 110 (LJL)

Dear Judge Liman:

The Government writes in support of offering the attached summary chart (GX 1403), and the underlying exhibits, into evidence. The chart summarizes the file names and titles of articles extracted from devices seized from the defendant's residence. The defense has indicated that it objects to the relevance of this chart and the underlying exhibits. The articles are being offered as proof of the defendant's intent and state of mind, and to rebut the defense argument that the defendant believed he was being harmed by his victims.

The defense has suggested through opening statement and cross examination that the defendant believed his victims' confessions of wrongdoing, and that the victims' mental health problems preexisted meeting the defendant and were not exacerbated by him. The articles listed in the summary chart support the Government's contention that the defendant deliberately sought to manipulate his victims, exploit their mental health issues, and control their behavior. The probative value of these exhibits is not outweighed by unfair prejudice under Rule 403. The fact that several of the articles include the word "cult" in the title is not unfairly prejudicial—these are not inflammatory descriptors being deployed by the Government, but articles that were of interest to the defendant himself.

Although the Government does not intend to argue that the defendant operated a "cult," the fact that he saved articles about "Cult Membership: What factors contribute to joining or leaving," "Cults and Mental Health," "Attachment Theory," "Mind Control," and "The Detection of Deception in Forensic Contexts," is probative that the defendant intended to victimize his daughter's roommates and did not have an innocent state of mind or genuinely-held beliefs about their wrongdoing. The summary chart the Government intends to offer through forensic examiner Stephen Flatley (GX 1406), includes metadata indicating the date the defendant saved many of these articles, which falls within the timeframe of the conspiracy. That the defendant saved these articles during the time he was accusing his victims of wrongdoing and encouraging some of his

victims to seek hospitalization underscores the probative value of these exhibits.

Respectfully submitted,

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Selection of Articles on Lawrence Ray's Hard Drives

GX	File Name	Title
1701	1-s2.0-S0033318216300883-main.pdf	Catatonic and Psychotic Symptoms owing to the Trauma of Captivity in a Cult Environment
1702	1-s2.0-S0165178116319941-main.pdf	Cult Membership: What factors contribute to joining or leaving
1703	3-s2.0-B9780123970459000057-main.pdf	Disorders of a Negative Affect
1704	3-s2.0-B9780123970459001531-main.pdf	Cults and Mental Health
1813	Borderline Personality Engergetics Institute.pdf	Borderline Personality
1812	Attachment.pdf	Attachment
1811	Attachment Theory.pdf	Attachment Theory
1810	Attachment and Borderline Personality Disorder(1)-(1).pdf	Attachment and Borderline Personality Disorder
1814	BorderlinePDSC.pdf	Borderline Personality Disorder: the NICE Guideline on Treatment and Management
1815	BPD PowerPoint.pdf	Psychotherapy of Borderline Personality Disorder
1816	BPD-CMAJ.pdf	Borderline Personality Disorder
1817	Chaotic Logic_ Chapter Eleven – MIND AND REALITY.pdf	Chapter Eleven: Mind and Reality
2005	348.pdf	Attachment Theory: A “Secure Base” for Psychotherapy Integration
2003	39.pdf	Conceptions of the Self in Western and Eastern Psychology
2004	206.pdf	Memory and Responsibility: Navigating Identity and Shame in the German-Jewish Experience

2006	376.pdf	Attachment Anxiety and Attentional Control Predict Immediate and Delayed Emotional Stroop Interference
2007	2012-08601-001.pdf	Father Involvement, Paternal Sensitivity, and Father-Child Attachment Security in the First 3 Years
2008	A-Few-Can-Catch-A-Liar.pdf	A Few Can Catch a Liar
2009	Amphetamibe Challenge809.pdf	The Amphetamine Challenge Test in Patients with Borderline Personality Disorder
2010	Become-Versed-in-reading-faces.pdf	Become Versed in Reading Faces
2011	Epidemiology-psychoses.pdf	Classification and Epidemiology of Psychosis
2012	Facial-Expression-of-Emotion1.pdf	Facial Expression of Emotion
2013	Food Additives Affect Behavior - Nutrition.pdf	Food Additives Affect Behavior
2014	'I had to psychologically dislocate a detainee'_Former CIA agent reveals 'torture' methods and secret prison in memoir_Mail Online.pdf	Journey into the CIA's heart of darkness: Exagent reveals 'torture' of terror suspect in secret prison dubbed 'Hotel California'
2016	Industrial-Organizational Psychology.pdf	Industrial/Organizational Psychology
2017	Knightmare.pdf	Knightmare in Armor: Reflections on Wilhelm Reich's Contributions to Psychoanalysis

2018	Lie-Detection-And-Language-Comprehension.pdf	Lie Detection and Language Comprehension
2021	Microchip Mind control_Implants and Cybernetics.pdf	Microchip Mind Control, Implants and Cybernetics
2022	Mind Control.pdf	Mind Control
2023	Mind Control-The Ultimate Terror pdf	Mind Control: The Ultimate Terror
2025	Parameters-Us Army War College Quarterly – Spring 1998.pdf	The Mind has no Firewall
2026	PsycCritiques – Where Have All the Skinnerians Gone.pdf	Where have all the Skinnerians Gone?
2027	The Character of Socrates.pdf	The Charter of Socrates
2028	The Detection of Deception in Forensic Contexts - Pär Anders Granhag, Leif A. Strömwall	The Detection of Deception in Forensic Contexts
2029	The Self.pdf	Culture and the Self: Implications for Cognition, Emotion, and Motivation

Extracted Devices Seized on February 11, 2020 from 40 Holly Lane, Piscataway, NJ

GX 1700: HD Omen Desktop PC		
Location: Room I FBI Cart Number: NYC027944 FBI 1B Number: 1B36		
Exhibit	File Name	Date
1700A	Device Extraction	
1701	1-s2.0-S0033318216300883-main.pdf	
1702	1-s2.0-S0165178116319941-main.pdf	
1703	3-s2.0-B9780123970459000057-main.pdf	
1704	3-s2.0-B9780123970459001531-main.pdf	
1705	CD SP Part 1 12Oct2018.wav	
1706	FR Columbia P&S 01April2008.jpg	
1707	FR Columbia P&S Graduation 18May2011.jpg	
1708	image.jpeg	
1709	New recording 40.m4a	10/16/2018, 12:59 a.m.
1710	Still from SJR video of CDD injury by DiTommaso at Hudson Hotel 18Sept2015.PNG	
1711	WS700140 (sept 2012).WMA	9/30/2012
1712	WS700170.WMA	3/24/2014
1713	WS700138.WMA	9/26/2012

GX 1800: Hard Drive Serial #: WCC4N6HZR2E3		
Location: Room H		
FBI Cart Number: NYC027994		
FBI 1B Number: 1B38		
GX	File Name	Date
1800A	Device Extraction	
1801	_MG_1113.JPG	8/23/2011
1802	_MG_1124.JPG	8/23/2011
1803	_MG_1128.JPG	9/6/2011
1804	_MG_1146.JPG	9/12/2011
1805	_MG_1208.JPG	9/12/2011
1806	_MG_1288.JPG	10/23/2011
1807	_MG_1348.JPG	10/23/2011
1808	_MG_1350.JPG	10/23/2011
1809	_MG_1500.JPG	10/23/2011
1810	Attachment and Borderline Personality Disorder(1)-1.pdf	11/5/2012
1811	Attachment Theory.pdf	1/7/2013
1812	Attachment.pdf	1/7/2013
1813	Borderline Personality Engergetics Institute.pdf	3/31/2014
1814	BorderlinePDSC.pdf	7/9/2013
1815	BPD PowerPoint.pdf	10/29/2013
1816	BPD-CMAJ.pdf	10/29/2013
1817	Chaotic Logic_ Chapter Eleven - MIND AND REALITY.pdf	3/31/2014
1818	CIMG0002.jpg	11/25/2010
1819	CIMG0044.jpg	11/25/2010
1820	CIMG0782.JPG	8/11/2008
1821	CIMG0790.JPG	8/12/2008
1822	CIMG0794.JPG	8/12/2008
1823	CIMG0979.JPG	6/10/2019
1824	CIMG0993.JPG	6/10/2019
1825	CIMG0997.JPG	6/10/2019
1826	CIMG1022.JPG	6/10/2019
1827	CIMG1028.JPG	6/10/2019
1828	Daniel Levin November 2012 Expense Log.pdf	4/30/2014
1829	Daniel Levin September 2012 Expense Log.pdf	7/18/2014
1830	IMG_0106.MOV	12/22/2012
1831	IMG_0133.MOV	1/4/2013, 1:59 a.m.
1832	IMG_0290.jpg	8/7/2011
1833	IMG_0292.jpg	8/7/2011
1834	IMG_0345.JPG	5/16/2013

1835	IMG_0358.JPG	5/17/2013
1836	IMG_0359.JPG	5/17/2013
1837	IMG_0362.JPG	5/17/2013
1838	IMG_0368.JPG	5/17/2013
1839	IMG_0371.JPG	5/17/2013
1840	IMG_0385[5657449].JPG	5/9/2013
1841	IMG_0415.JPG	5/22/2013
1842	IMG_0417.JPG	5/22/2013
1843	IMG_0418.JPG	5/22/2013
1844	IMG_0420.JPG	5/22/2013
1845	IMG_0447.JPG	5/27/2013
1846	IMG_0448.JPG	5/27/2013
1847	IMG_0453.JPG	5/27/2013
1848	IMG_0455.JPG	5/27/2013
1849	IMG_0456.JPG	5/27/2013
1850	IMG_0460.JPG	5/27/2013
1851	IMG_0500.JPG	11/23/2013
1852	IMG_0502.JPG	11/23/2013
1853	IMG_0507.JPG	11/23/2013
1854	IMG_0508.JPG	11/23/2013
1855	IMG_0724.JPG	3/5/2014
1856	IMG_1003.JPG	8/20/2013
1857	IMG_1018.JPG	8/22/2013
1858	IMG_1020.JPG	8/22/2013
1859	IMG_1023.JPG	8/22/2013
1860	IMG_1027.JPG	8/23/2013
1861	IMG_1031.JPG	8/27/2013
1862	IMG_1032.JPG	8/27/2013
1863	IMG_1035.JPG	8/27/2013
1864	IMG_1044.JPG	8/29/2013
1865	IMG_1045.JPG	8/29/2013
1866	IMG_1046.JPG	8/29/2013
1867	IMG_1054.JPG	9/1/2013
1868	IMG_1056.JPG	9/1/2013
1869	IMG_1066.JPG	9/1/2013
1870	IMG_1087.JPG	9/1/2013
1871	IMG_1088.JPG	9/1/2013
1872	IMG_1107.JPG	9/8/2013
1873	IMG_1110.JPG	9/8/2013
1874	IMG_1117.JPG	9/10/2013
1875	IMG_1119.JPG	9/10/2013

1876	IMG_1128.JPG	9/12/2013
1877	IMG_1392.MOV	6/22/2013, 3:27 a.m.
1878	IMG_1402.MOV	6/27/2013, 11:17 p.m.
1879	IMG_1403.MOV	6/27/2013, 11:21 p.m.
1880	IMG_1405.MOV	6/28/2013, 12:09 a.m.
1881	IMG_0131.MOV	1/3/2013, 10:42 p.m.
1882	IMG_1301.MOV	11/1/2013
1883	IMG_1420.MOV	10/12/2013
1884	IMG_1473.MOV	10/16/2013
1885	IMG_1496.MOV	10/17/2013
1886	IMG_1536.MOV	2/17/2014

GX 1900: Black iPhone		
Location: Room L on the nightstand		
FBI Cart Number: NYC027938		
FBI 1B Number: 1B47		
GX	File Name	Date
1900A	Device Extraction	
1901	20151223 164128.m4a	12/23/2015
1902	20190511-005151.m4a	5/11/2019
1904	20190515 050455.m4a	5/15/2019
1905	Selected searched items	
1906	20190511 225853.m4a	5/11/2012

GX 2000: Hard Drive, Serial #: Z1005MGT		
Location: Room L, on the bookshelf		
FBI Cart Number: NYC028014		
FBI 1B Number: 1B52-2		
GX	File Name	Date
2000A	Device Extraction	
2001	9_24_11 632 AM 9_24_11 259 AM.m4a.mpg	9/24/2011
2002	9_24_11 721 AM 9_24_11 631 AM.m4a.mpg	9/24/2011
2003	39.pdf	4/16/2012
2004	206.pdf	4/16/2012
2005	348.pdf	4/16/2012
2006	376.pdf	4/16/2012
2007	2012-08601-001.pdf	4/16/2012
2008	A-Few-Can-Catch-A-Liar.pdf	4/24/2012
2009	~Amphetamibe Challenge809.pdf	12/2/2011
2010	Become-Versed-in-reading-faces.pdf	4/24/2012
2011	Epidemiology_psychoses.pdf	4/29/2012
2012	Facial-Expression-Of-Emotion1.pdf	4/24/2012
2013	Food Additives Affect Behavior - Nutrition.pdf	2/13/2012
2014	'I had to psychologically dislocate a detainee'_ Former CIA agent reveals 'torture' methods and secret prison in memoir Mail Online.pdf	1/27/2012
2016	Industrial-Organizational Psychology.pdf	1/27/2012
2017	Knightmare.pdf	11/18/2011
2018	Lie-Detection-And-Language-Comprehension.pdf	4/24/2012
2020	Messages 917-566-9122 with Felicia [Redboxed].pdf	
2021	Microchip Mind Control_ Implants And Cybernetics.pdf	2/13/2012
2022	Mind Control.pdf	1/26/2012
2023	Mind Control-The Ultimate Terror.pdf	1/26/2012
2024	Movie.mov	8/6/2011
2025	PARAMETERS_ US Army War College Quarterly - Spring 1998.pdf	2/15/2012
2026	PsycCRITIQUES - Where Have All the Skinnerians Gone.pdf	4/16/2012
2027	The Character of Socrates.pdf	11/10/2011
2028	The detection of deception in forensic contexts - Pär Anders Granhag_ Leif A. Strömwall - Google Books.pdf	1/27/2012
2029	The Self.pdf	1/26/2012
2030	WS700016.WMA	2/9/2012

GX 2100: Hard Drive, Serial #: WUMVA238994		
Location: Room L		
FBI Cart Number: NYC028011		
FBI 1B Number: 1B59-2		
GX	File Name	Date
2100A	Device Extraction	
2101	00006.mts	7/2/2012
2102	00007.mts	7/2/2012
2103	9_17_11 717 PM 9_17_11 658 PM.m4a.mpg	9/17/2011
2104	000011.mts	7/2/2012
2105	Dr. Felicia Rosario.mov	11/16/2012
2106	HF_2.mov	9/3/2012
2107	IMAG0050.JPG	10/18/2011
2108	IMAG0051.JPG	10/18/2011
2109	IMG_0038.MOV	1/10/2012
2110	IMG_0043.JPG	4/21/2014
2111	IMG_0043.JPG(2)	2/11/2014
2112	IMG_0051.MOV	1/12/2012
2113	IMG_0401.MOV	7/2/2012
2114	IMG_0508.JPG	8/24/2012
2115	IMG_0610.MOV	5/31/2013
2116	IMG_0672.JPG	11/23/2012
2117	IMG_0673.JPG	11/23/2012
2118	IMG_0675.JPG	11/23/2012
2119	IMG_0677.JPG	6/5/2013
2120	IMG_0678.JPG	6/5/2013
2121	IMG_0679.JPG	6/5/2013
2122	IMG_0695.MOV	12/8/2012
2123	IMG_0712.JPG	1/4/2013 12:36 a.m.
2124	IMG_0713.JPG	1/4/2013
2125	IMG_0714.JPG	1/4/2013
2126	IMG_0775.JPG	6/29/2013
2127	IMG_0803.MOV	7/9/2013
2128	IMG_0804.MOV	7/9/2013
2129	IMG_0812.MOV	7/9/2013
2130	IMG_0818.MOV	7/9/2013
2131	IMG_0823.MOV	7/9/2013
2132	IMG_0830.MOV	7/9/2013
2133	IMG_1038.MOV	8/29/2013
2134	IMG_1262.MOV	10/22/2013
2135	IMG_1310.MOV	11/1/2013
2136	IMG_1338.MOV	11/11/2013

2137	IMG_1420.MOV	12/11/2013
2138	IMG_1467.MOV	1/18/2014
2139	IMG_1470.JPG	1/18/2014
2140	IMG_1471.JPG	1/18/2014
2141	IMG_1472.JPG	1/18/2014
2142	IMG_1473.JPG	1/18/2014
2143	IMG_1474.JPG	1/18/2014
2144	IMG_1620.MOV	11/11/2013
2145	Santo's trying to get Felicia's attention 1 copy.mov	1/20/2014
2146	Untitled copy.mov	12/7/2012
2147	20121108_223541.mp4	11/8/2012, 10:42 p.m.
2148	FELA 20130202_031006.mp4.mpg	2/2/2013, 3:11 a.m.
2149	FELA 20130202_031517.mp4	2/2/2013, 3:16 a.m.
2150	FELA Belk Dressing Room VIDEO0031.mp4	6/27/2013, 6:28 p.m.
2151	FELA Guys apt MAQ00013.MP4	2/2/2013, 1:38 a.m.
2152	FELA IZ [REDACTED] IMG_0422.MOV	4/29/2013, 1:41 a.m.
2153	FELA IZ Sucking [REDACTED] VIDEO0012.mp4.mpg	4/29/2013, 1:51 a.m.
2154	FELA MAQ00015.MP4	2/2/2013, 1:53 a.m.
2155	HF_vlc trans.mpg	9/10/2012, 7:27 p.m.
2156	IMG_0048.MOV	11/13/2012, 3:06 a.m.
2157	IMG_0053.MOV	11/14/2012, 1:27 a.m.
2158	IMG_0057.MOV	11/14/2012, 2:03 a.m.
2159	IMG_00573.MOV	12/11/2013, 10:38 p.m.
2160	IMG_0059.MOV	11/14/2012, 2:17 a.m.
2161	IMG_0421.MOV	4/29/2013, 1:05 a.m.
2162	IMG_0423.MOV	4/29/2013, 1:48 a.m.
2163	IMG_0427.MOV	4/29/2013, 10:25 p.m.
2164	IMG_0428.MOV	4/29/2013, 10:52 p.m.
2165	IMG_0429.MOV	4/29/2013, 11:11 p.m.
2166	IMG_0431.MOV	4/29/2013, 3:20 a.m.
2167	IMG_0432.MOV	4/29/2013, 3:24 a.m.
2168	IMG_0433.MOV	4/29/2013, 3:32 a.m.
2169	IMG_1393.MOV	6/22/2013, 3:57 a.m.
2170	IMG_1395.MOV	6/22/2013, 5:47 a.m.
2171	IZ_FELA 2 [REDACTED] Times square.mp4	4/29/2013, 2:29 a.m.
2172	IZ_FELA bar bathroom IMG_00040.MOV	2/10/2013, 2:04 p.m.
2173	MAH00030.MP4	5/23/2013, 6:15 p.m.
2174	MAQ00011.MP4	2/2/2013, 1:25 a.m.
2175	MAQ00014.MP4	2/2/2013, 1:41 a.m.
2176	MAQ00021.MP4	2/2/2013, 1:53 a.m.

2177	VIDEO0001.mp4	11/13/2012, 5:17 p.m.
2178	VIDEO0005.mp4	4/18/2013, 3:57 p.m.
2179	VIDEO0008.mp4.mpg	4/18/2013, 4:45 p.m.
2180	VIDEO0009.mp4.mpg	4/18/2013, 4:48 p.m.
2181	VIDEO0010.mp4.mpg	4/18/2013, 4:49 p.m.
2182	VIDEO0020.mp4	4/29/2013, 3:48 a.m.

GX 2190: 2TB G Drive, FA0HXM9D		
Location: Room L		
FBI Cart Number: NYC028012		
FBI 1B Number: 1B59-1		
GX	File Name	Date
2190A	Device Extraction	
2191	Task Assignments.xlsx	2/27/2014
2192	Task list _2.xlsx	4/19/2014

GX 2200: Felicia Rosario iPhone in Pink Case	
FBI Cart Number: NYC027940	
FBI 1B Number: 1B70	
GX	File Name
2200A	Device Extraction
2201	SMS Messages.pdf
2202	Notes-Selected.pdf

Additional Devices			
Location: Room L			
GX	1B Number	Device	User
1318	1B73	white iPod	Iban Goicoechea
1319	1B75	silver iPod	Yalitza Rosario
1320	1B78	black LG phone	Santos Rosario
1321	1B79	purple LG phone	Yalitza Rosario
1322	1B80	black LG phone	Claudia Drury
1323	1B64-1	Toshiba drive	Daniel Levin
1324	1B64-2	Toshiba drive	Yalitza Rosario
1325	1B64-3	WD Scorpio drive	Santos Rosario

**Extracted Devices Seized on February 11, 2020
from 140 Ethel Road, Piscataway, NJ**

Additional Devices			
GX	1B Number	Device	User
1316	1B12	Asus Laptop	Santos Rosario
1317	1B17	Acer Laptop	Cleo Beletsis

Extraction of Claudia Drury iPhone

GX 1100: Claudia Drury White and Pink iPhone S, Model 1688	
GX	File Name
1100	16102126944 texts.pdf
1101	iPhone Analysis-Call Log-Andromeda.pdf
1102	iPhone Analysis-Call Log-Marcus Aurelius.pdf
1103	iPhone Analysis-Chats-Andromeda.pdf
1104	iPhone Analysis-Chats-Marcus Aurelius.pdf
1105	iPhone Analysis-Emails-Backpage.pdf
1106	iPhone Analysis-Notes Selected.pdf